

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JEFFREY SIEGEL, Administrator of  
the Estate of MOUSTAPHA AKKAD,  
Deceased, SOOHA AKKAD, individually;  
SUSAN GITELSON, Special Administrator  
of the Estate of RIMA AKKAD MONLA,  
deceased; and MICHAEL BUTLER,

Plaintiffs,

v.

H GROUP HOLDING, INC.,  
a corporation; GLOBAL HYATT  
CORPORATION, a corporation;  
HYATT INTERNATIONAL  
CORPORATION, a corporation; HYATT  
CORPORATION, a corporation; HYATT  
HOTELS CORPORATION, a corporation;  
HYATT INTERNATIONAL (EUROPE  
AFRICA MIDDLE EAST) LLC;  
AIC HOLDING CO., a  
corporation; HYATT INTERNATIONAL  
HOLDINGS, CO., a corporation;  
HI HOLDINGS LUXEMBURG S.a.r.l.;  
ZARA INVESTMENT HOLDING CO.;  
and AMMAN TOURISM INVESTMENT  
CO., LTD.,

Defendants.

No. 07 C 6830  
Judge John W. Darrah

**AGREED MOTION OF DEFENDANTS ZARA INVESTMENT (HOLDING) CO. AND  
AMMAN TOURISM INVESTMENT CO LTD. FOR ADDITIONAL TIME TO FILE  
MOTION PURSUANT TO 12(b) IN LIEU OF ANSWER**

Defendants Zara Investment (Holding) Co. and Amman Tourism Investment Co., Ltd., by their counsel Schoenberg Finkel Newman & Rosenberg, LLC, move the Court for additional time to file a motion under Rule 12(b) of the Federal Rules of Civil Procedure, in lieu of the their answer and state:

1. Plaintiffs, Jeffrey Siegel, Administrator of the Estate of Moustapha Akkad, deceased, Sooha Akkad, individually, Susan Gitelson, Special Administrator of the Estate of Rima Akkad Monla, deceased, and Michael Butler, filed the present action in the Circuit Court of Illinois against several defendants, including defendants Zara Investment (Holding) Co. and Amman Tourism Investment Co., Ltd. The case was subsequently removed to

federal court on the basis of diversity jurisdiction. Plaintiffs have filed a motion to remand the case to state court, which motion remains pending.

2. The responsive pleading of Defendants Zara Investment (Holding) Co. and Amman Tourism Investment Co., Ltd. is currently due on March 17, 2008.

3. Defendants have filed their appearance by counsel on today's date, March 17, 2008. Defendants intend to file a motion to dismiss for lack of personal jurisdiction under Federal Rule 12(b) and pursuant to the common law doctrine of *forum non conveniens*. Defense counsel have drafted a motion to dismiss and memorandum of law in support thereof, but seek an additional seven (7) days within which to complete and file the motion and memorandum.

4. Counsel for defendants Zara Investment (Holding) Co. and Amman Tourism Investment Co., Ltd. have also conferred with plaintiffs' counsel and counsel for the remaining defendants, and neither plaintiffs nor co-defendants have an objection to this motion.

Wherefore, defendants Zara Investment Holding Co. and Amman Tourism Investment Co., Ltd., respectfully request that this Honorable Court enter an order granting them an additional seven (7) days, on or before March 25, 2008, within which to file a motion under Rule 12(b) of the Federal Rules of Civil Procedure in lieu of their answer.

Respectfully submitted,

/s/ Adam J. Glazer  
One of Defendants' Attorneys

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